

Message

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**From:** Sankula, Sujatha [Sankula.Sujatha@epa.gov]  
**Sent:** 6/2/2021 9:20:41 PM  
**To:** Garber, Kristina [Garber.Kristina@epa.gov]  
**Subject:** FW: Neonics Treated Seeds Topic: 6/8 Full SFIREG Mtg

Kris

Please see the ask below. Can you please handle this one in the SFIREG meeting next Tues? From what I heard, no slides needed, may be a 2 min discussion on the seed treatment/pollinators. Please let me know. Thank you.

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**From:** Holmes, Jean <Holmes.Jean@epa.gov>  
**Sent:** Wednesday, June 02, 2021 4:55 PM  
**To:** Sankula, Sujatha <Sankula.Sujatha@epa.gov>  
**Subject:** FW: Neonics Treated Seeds Topic: 6/8 Full SFIREG Mtg

Hi Sujatha,

This is the topic I raised at the management meeting this meeting. EFED needs someone to be available to talk for about a couple of minutes about neonic seed treatment pollinator risk assessment, last item on the agenda below. Justin spoke with Keith and unfortunately he is on leave next Tuesday. Would Kris be available. If so, could you send a note to Sandra to let her know. If not please let me know and I will ask Tom.

Thanks

Jean

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**From:** Steeger, Thomas <Steeger.Thomas@epa.gov>  
**Sent:** Tuesday, June 01, 2021 7:45 PM  
**To:** O'Neill, Sandra <ONeill.Sandra@epa.gov>  
**Cc:** Holmes, Jean <Holmes.Jean@epa.gov>  
**Subject:** RE: Neonics Treated Seeds Topic: 6/8 Full SFIREG Mtg

Sandra

Following through on today's meeting and with respect to the questions posted in the invite, the last question could be addressed by EFED (provided EFED management agrees). The last sentence though (highlighted in yellow) also pertains to EFED with respect to evaluating potential risks to pollinators from neonicotinoid-treated seed. EFED management would have to identify the appropriate staff member.

Tom Steeger

-----Original Appointment-----

**From:** O'Neill, Sandra <ONeill.Sandra@epa.gov>  
**Sent:** Tuesday, May 25, 2021 9:28 AM  
**To:** O'Neill, Sandra; Arrington, Linda; Friedman, Dana; Costello, Kevin; Sappington, Keith; Olinger, Christine; Huskey, Angela; Knorr, Michele; Bartow, Susan; Javier, Julie; Muhammad, Maryam K.; Gavin, Quinn; Colby, Deanna; Steeger, Thomas; Aranda, Amber; Swartz, Christina  
**Cc:** Hopkins, Yvette; Picone, Kaitlin; Emdur, Zoe; Koch, Erin

**Subject:** Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

**When:** Tuesday, June 1, 2021 12:00 PM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

Greetings all,

The purpose of this meeting is to prepare for the Neonicotinoid Treated Seed Issues session at the Full SFIREG June 8 meeting. SFIREG's questions for this session are below. We want to make sure we have the right group of people to weigh in on the questions. Please feel free to forward to any that should be included.

**SFIREG Questions for EPA:**

- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
- When does EPA anticipate finalizing the answers to the coated seed petition?
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
- Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
- If so, is this being considered by EPA?
- Were/are the seed treatment associations in contact with EPA?
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed? With respect to ecological risk and pending EFED management input, EFED could provide a response.

If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

Thanks and please let me know if you have any questions.

Best,

Sandra O'Neill

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